



## Operator Specialty Company, Inc.

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February 7, 2002

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

Re: Review of Part 15 and Other Parts of the Commission's Rules

Dear Commission:

Operator Specialty Company, Inc. (OSCO) submits the following comments to the Commission regarding the above referenced matter. OSCO manufactures door and gate operators and sells these products throughout the United States and overseas. There are over 25 million homes and business across the United States served by our industry. Most of the installations have some form of radio control device to actuate them.

These comments are to specifically address the proposals found in the Petition by SAVI Technology, Inc. requesting modifications to the regulations governing Part 15 devices. SAVI seeks to change the rules to accommodate a new Radio Frequency Identification (RFID) technology. The commission needs to balance this petition so that it does not threaten current and future installations. SAVI's proposals would dramatically increase the duty cycle on Part 15 devices and create jamming signals. These devices are to be broadcasting in a band that is heavily used by residential and commercial establishments.

The current rules understandably limit the transmission power and duration to maximize a device's utility while minimizing the potential for interference. The proposed changes would allow new devices of unproven utility to overpower the transmission signals of millions of existing devices and render them unreliable. If the Commission determines that the further advancement of RFIDs is so critical to public interest that it must support rollout of the new technology, it could consider moving RFIDs out of the current band to another where interference issues might be lessened.

The potential interference problems are real. If the Commission is inclined to grant this request, the frequency should be assigned outside the range used in this industry, 260 – 450 MHz.

For the above reasons, OSCO requests the Commission deny SAVI's request or change the frequency so as not to interfere with a very large, established base.

Sincerely,

Wm. R. Hildebrand  
C.O.O.

WRH/jls

Cc: Via ECFS  
Hard Copy following by Federal Express